



NEWFOUNDLAND & LABRADOR
HISTORIC TRUST
— est 1966 —

May 28, 2024

Mayor Danny Breen
Deputy Mayor Sheilagh O'Leary
Councillors Burton, Ellsworth, Bruce, Ravencroft, Hanlon, Hickman, Korab, Davis, and Ridgeley
City of St. John's
P.O. Box 908
St. John's, NL A1C 5M2

Re: Text Amendment - Housing

The Newfoundland and Labrador Historic Trust (NLHT) was founded with people as one of its three pillars and, in its history, has contributed directly to the development of historic homes as affordable housing in downtown St. John's. The board of the NLHT remains committed to supporting affordable housing in heritage buildings and heritage areas. We are therefore encouraged to see a substantial proposal by the City of St. John's to grow the supply of housing. However, we believe the City's plan has been insufficiently considered for both its negative consequences for heritage buildings/landscapes and its lack of ambition in other areas which would ease development pressure on historic buildings.

As the recent demolition of the house at 4 Maxse Street highlighted, to the surprise of many, there are currently no limits on demolition in St. John's Heritage Areas outside a small number of designated heritage buildings. A general increase in allowed density will increase development pressure and likely result in loss of many more buildings people believe are or should be protected. In order to limit the unintended degradation of the city's stock of heritage buildings, the City must proactively identify and protect buildings that contribute to the historic built environment. The NLHT is happy to welcome density if it comes with corresponding protections for buildings that contribute to our history, culture, and tourism. As in Fredericton, the City should seek to balance density with heritage¹ through targeted protection and incentives for conservation.

At the same time as we identify buildings worth protecting, the City should identify vacant lots and other developable properties and encourage or incentivize their development. A quick review of the downtown area reveals more than 10 acres² of vacant or under-utilised properties (e.g. parking) that could be prioritised for housing. The downtown area has historically been dense and can support greater density today without the loss of significant properties. In fact, several notable losses have

¹ ["Fredericton seeks to balance density, heritage as it drafts new development plan." CBC News.](#)

² Looking only at properties over 1000 m² in area, this includes 35 Hamilton Ave., 130 New Gower St., 345 Water St., 20 Long's Hill, 70 Queen's Rd., 50 Harbour Dr., 258 Duckworth St., 216-236 Duckworth St./3-5 Kickham Pl./21 Holloway St., 172 Duckworth St., 132 Duckworth St., 2-12 Water St., 32-36 Temperance St..

The Newfoundland and Labrador Historic Trust is dedicated to the preservation of the province's buildings and landscapes and their importance to communities.

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reduced density in the city. Quinipiac, the land around which could have supported multiple houses or apartments, has been replaced with a sprawling single-family home and 4 Maxse, which could have supported multiple families, was demolished for an addition to a neighbouring property.

The NLHT also believes the City is not going far enough in densifying areas outside the downtown core which we believe would relieve pressure on Heritage Areas. The plan includes no upzoning of R1 areas to R2 or greater in areas near the downtown, preserving a band of low-density living around areas slated for much greater density. Lastly, the plan seems to ignore the role of transit in enabling densification and supporting Heritage Areas. By permitting more units along Metrobus routes, for example, the City could enable easy, convenient, and affordable commuting to centres including the Heritage Areas.

For these reasons, the NLHT presents the following calls:

1. Whereas there is currently no demolition control in Heritage Areas for undesignated buildings, regardless of social or architectural value, **the NLHT calls on the City of St. John's to develop an inventory of historic buildings and landscapes in the city and implement protections, including a demolition review process for identified sites and Heritage Areas.**
2. Whereas upzoning will be disproportionately applied in Heritage Areas (largely zoned RD), **the NLHT calls on the City to permit greater density outside the downtown core, for example by rezoning low-density areas close to the downtown, increasing permitted density (particularly along transit routes), and reducing mandatory parking requirements, e.g. for backyard suites, to even the playing field with the RD zone.**
3. Whereas there remains significant un- or under-developed land in Heritage Areas, **the NLHT calls on the City of St. John's to encourage development of vacant lots and derelict buildings without historic significance through, for example, targeted upzoning and elimination of reduced tax rates for vacant commercial land and tax allowances for vacant commercial properties.**
4. Whereas St. John's Heritage Areas and designated heritage buildings have suffered significant neglect, **the NLHT calls on the City to prioritise affordable housing projects that include the conservation of historic properties.**

The City has provided a short window in which to review its proposed changes and comment. The NLHT therefore further encourages the City to consider other measures that would meet the goals above while supporting heritage conservation, local identity and wellbeing, and the sustainability of tourism in the city. The NLHT would be happy to discuss the above and other measures.

Sincerely,

Board of Directors
Newfoundland and Labrador Historic Trust

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